

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:19CR961 SRC
)
DENEISHA BAKER,)
)
Defendant.)

MOTION TO STAY FOR COMPLETION OR TERMINATION FROM THE PRE-TRIAL DIVERSION PROGRAM

COMES NOW, the United States of America, by and through Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Paul J. D'Agrosa, Assistant United States Attorney for said District, and moves to stay the pending charges against the defendant, Deneisha Baker for up to 18 months. In support thereof, the United States submits:

- 1) The United States Attorney's Office (USAO), the Defendant, after consultation with her counsel, and the United States Pre-Trial Services Office (Pre-Trial) have agreed for the defendant to enter the Pre-Trial Diversion Program (Program) administered by Pre-Trial beginning on July 8, 2021.
- 2) The agreement of the parties is contained the "Agreement for Pretrial Diversion" (Agreement) signed by all parties. The Agreement states the Program is 18 months long.
- 3) Should the defendant violate the Agreement and be terminated from the Program, the USAO would move his Court to lift the stay and place the case back on to the Court's trial docket for disposition.
- 4) The parties will file a joint status report on or about January 7, 2023 to update the Court as to the defendant's completion of the Program. Should the defendant be unsuccessful and

terminated before completion of the Program, the USAO will notify the Court forthwith.

WHEREFORE, the USAO respectfully requests the Court stay the pending proceedings for a term of up to 18 months to allow the defendant to complete the Program.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Paul J. D'Agrosa
PAUL J. D'AGROSA (36966MO)
Assistant United States Attorney
111 South 10th Street, Rm. 20.333
St. Louis, Missouri 63102

SO ORDERED:

STEPHEN R. CLARK
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Paul J. D'Agrosa
